

# **EXHIBIT 2**



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January 10, 2023

*Via Email*

Ari Holtzblatt  
WILMER HALE LLP  
1875 Pennsylvania Ave, N.W.  
Washington, DC 20006

Re: *Bright Data Ltd. v. Meta Platforms, Inc.*, (Del. Sup. Ct.)  
*Consent for Public Filing of Delaware Complaint.*

Dear Ari:

On our January 6<sup>th</sup> call, we asked whether Meta would insist that we file our Complaint under seal. You said you would let us know, but could not promise to respond by the parties' 3 pm proposed filing time. We did not hear from you (and still have not), and as such, we proceeded to file the Complaint under seal.

We will plan on filing a redacted, public version once the Court grants our motion to seal. But, as we mentioned, we don't think the Complaint meets the standards for sealing. This is especially true since Exhibit 11 to your California Complaint reveals the existence of the parties' contract, and thus, arguably breaches – or at least renders moot – that aspect of the confidentiality agreement. We do not need to engage in any back and forth about whether there was such a breach, but we do believe that this means that our Complaint should now be filed publicly.

Accordingly, please let us know if you consent to the public filing of the Complaint. If so, we will look into the proper procedure for effectuating this. If not, let us know if you plan on opposing a motion to unseal.

Sincerely,

/s/ *Colin R. Kass*